

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 13-mc-87 (SRN/TNL)

UNITED STATES OF AMERICA,)	
)	
Petitioner,)	STIPULATION AND JOINT
)	REQUEST TO CONTINUE
v.)	HEARING ON CIVIL
JOHN K. THORNTON,)	CONTEMPT
)	
Respondent.)	

Petitioner United States of America and Respondent John K. Thornton (hereinafter “the Parties”), by counsel, state as follows:

WHEREAS, the parties are presently set to appear before this Court on May 22, 2018, at 1:30 p.m. for further proceedings involving Respondent’s civil contempt;

WHEREAS, the bench warrant for the apprehension of Respondent is stayed pending those proceedings;

WHEREAS, Respondent appeared with counsel on May 21, 2018, at the United States Attorney’s Office in Minneapolis, MN, to provide testimony to the Internal Revenue Service (“IRS”).

WHEREAS, Respondent answered the IRS’s questions and provided additional documentation responsive to the summonses at issue in this lawsuit.

WHEREAS, Respondent agrees to voluntarily surrender additional assets to the IRS on May 24, 2018, in partial satisfaction of tax debt that is due and owing.

WHEREAS, Respondent expressed a desire to file with the IRS delinquent income tax returns for the tax years at issue in the Income Tax Return summons but needs additional time to prepare the returns.

WHEREAS, counsel jointly called the Court on May 22, 2018, and requested to continue the civil contempt proceedings to provide Respondent thirty days to file the delinquent returns.

THEREFORE, the parties by counsel stipulate and jointly request that the Court issue an order as follows:

1. The hearing in this matter presently set for May 22, 2018, at 1:30 p.m. be stricken from the calendar and continued to Wednesday, July 25, 2018, at 11:00 a.m.
2. The bench warrant for the apprehension of Respondent John K. Thornton [Doc. No. 102] be stayed pending proceedings on July 25, 2018, at 11:00 a.m.
3. The parties be directed to jointly contact the Court on Friday, June 22, 2018, to provide a status update on Respondent's progress towards compliance with the IRS summonses.

SIGNATURE PAGE FOLLOWS

Dated: 5/22/18

s/ Thomas E. Brever
Thomas E. Brever
Foster Brever Wehrly, PLLC
2812 Anthony Lane S., Suite 200
St. Anthony, MN 55418
(612) 436-3291
tbrever@fosterbrever.com

Attorney for Respondent

Dated: 5/22/18

GREGORY G. BROOKER
United States Attorney

s/ Bahram Samie
BY: BAHRAM SAMIE
Assistant U.S. Attorney
Attorney ID Number 392645
600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415
Telephone: 612-664-5600
Facsimile: 612-664-5788
Email: Bahram.Samie@usdoj.gov

Attorneys for Petitioner